

## STATE OF MICHIGAN



JOHN ENGLER, Governor

**DEPARTMENT OF AGRICULTURE**

P.O. BOX 30017 • LANSING, MICHIGAN 48909

611 W. OTTAWA • LANSING, MICHIGAN 48933

DAN WYANT, Director

May 14, 1999

**Commission of Agriculture**

Douglas E. Darling  
James E. Maitland  
Shirley A. Skogman  
Deanna Stamp  
Jordan B. Tatter

Dockets Management Branch (HFA-305)  
U.S. Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

RE: Docket No. 98N-1038  
Irradiation in the Production, Processing and Handling of Food

Thank you for providing us with the opportunity to respond to the advanced notice of proposed rulemaking which was published in the Federal Register on February 17, 1999.

The Michigan Department of Agriculture (MDA) supports the United States Food and Drug Administration's (FDA) historical position that the best way to convey to consumers the factual information that a food has been irradiated is to require labeling with the radura logo, coupled with a disclosure statement. It is important that a required disclosure statement be such that it minimizes the potential that it be interpreted as a warning statement. Because there is no way of knowing, at present, how quickly use of such labeling requirements will cease to be informative to consumers, the MDA is opposed to setting an arbitrary future date upon which these labeling requirements would expire.

The MDA supports continuing current requirements that irradiated foods be clearly labeled because they:

- Allow Consumers To Make Informed Choices
  - Are Consistent With Long Established Labeling Principles
  - Support Consumer Confidence and Trust
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- **Allow Consumers To Make Informed Choices**

Results from recent consumer surveys (Food Marketing Institute, 1998; American Meat Institute, 1993) indicate that many consumers prefer irradiated food products once they have been informed of the proven benefits of food irradiation. At the same time, it is also true that some consumers are strongly opposed to food irradiation and would deeply resent government actions that deprive them of their ability to choose non-irradiated products. Individual willingness to adopt new technology varies. The MDA feels that consumers must be allowed to make their own decisions regarding the purchase of irradiated food products. Promoting informed consumer choice should facilitate more widespread selection of irradiated foods much as the use of microwave ovens and consumption of pasteurized milk are essentially non-issues for the vast majority of today's consumers.



98N-1038

C1780

Dockets Management Branch (HFA-305)

Page 2

May 14, 1999

- **Are Consistent With Long Established Labeling Principles**

Food labels currently require several types of descriptive information based on consumer demands. Examples include nutritional labeling to allow consumers to make dietary decisions, and product information related to issues of economic concern (percent water or fat). Consumers have indicated that labeling is especially important for product characteristics, like whether the food product has been irradiated or not, which are not readily obvious to the purchaser. Federal and state food labeling laws have consistently required that labels accurately convey information using symbols and terms which are likely to be read and understood by an ordinary person.

- **Support Consumer Confidence and Trust**

Increased availability of irradiated food products will likely be accompanied by increased media coverage of the issue. Consumers will be exposed to the views of both proponents and opponents of food irradiation. Risk communication research has shown that the potential for individual outrage increases when individuals lack control over exposure to a potential risk factor. The MDA feels that maintaining the consumer's ability to make a choice regarding consumption of irradiated foods is an important means of decreasing potential fear or apprehension regarding the issue.

The MDA believes that the current burden of foodborne illness in the United States warrants the use of additional food processing technologies to reduce contamination levels of disease causing microorganisms. Food irradiation has been scientifically proven to be a safe and effective means of reducing levels of disease causing microorganisms. The MDA therefore encourages the utilization of food irradiation technology in accordance with established safety standards and good manufacturing practices.

We are committed to efforts to provide Michigan consumers with accurate information regarding the safety and effectiveness of food irradiation. For this reason, we support required labeling of irradiated food products with the radura logo and an informative disclosure statement.

If my staff or I can be of any further assistance to you in this matter, please feel free to contact me at (517) 373-9730.

Sincerely,



Katherine Fedder, Division Director  
Food & Dairy Division

KF:jmd